

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ILLINOIS NATIONAL INSURANCE COMPANY, THE Case No.: 11-CV-00431 (KBF)
INSURANCE COMPANY OF THE STATE OF
PENNSYLVANIA, and NATIONAL UNION FIRE
INSURANCE COMPANY OF PITTSBURGH, PA,

Plaintiffs,

- against -

TUTOR PERINI CORPORATION,

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TUTOR PERINI CORPORATION,

Third-Party Plaintiff,

- against -

CERTAIN UNDERWRITERS AT LLOYD'S LONDON

Third-Party Defendant.
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SUPPLEMENTAL DECLARATION OF GEORGE ROCKAS

I, George Rockas, an attorney duly licensed to practice before this Court, hereby
declare under penalty of perjury pursuant to 28 U.S.C. § 1746 the following:

1. I am a Partner in the firm of Wilson, Elser, Moskowitz, Edelman & Dicker,
LLP, counsel for the Third-Party Defendant, Certain Underwriters at Lloyd's,
London who subscribe to Policy No. 576/UF7274400 ("Underwriters"). I
make this declaration based on a review of the contents of our files for this
matter.
2. I submit this declaration on behalf of Underwriters in support of their motion
for summary judgment.

3. Attached hereto as Exhibit 33 is a true and accurate copy of select pages from the Deposition of James Laing, dated July 30, 2012, in the subject action.
4. Attached hereto as Exhibit 34 is a true and accurate copy of an e-mail dated December 3, 2008, as marked Exhibit 182 at the deposition of James Laing, dated July 30, 2012, in the subject action.
5. Attached hereto as Exhibit 35 is a true and accurate copy of an e-mail dated January 12, 2009, as marked Exhibit 188 at the deposition of James Laing, dated July 30, 2012, in the subject action.
6. Attached hereto as Exhibit 36 is a true and accurate copy of select pages of the Deposition of David Melick, dated July 31, 2012, in the subject action.
7. Attached hereto as Exhibit 37 is a true and accurate copy of a general liability policy issued by Illinois National to the MTA covering the period October 1, 2005 to October 1, 2006, GL 155-67-21, as marked Exhibit 206 at the deposition of David Melick, dated July 31, 2012, in the subject action.

Signed under the pains and penalties of perjury, this 15th day of August 2012.

/s/ George C. Rockas
George C. Rockas
WILSON, ELSER
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